



September 8, 2023

MEMO ENDORSED

Via ECF and E-mail

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

**Re: *In re Tether and Bitfinex Crypto Asset Litigation*, 19-CV-09236 (KPF) –
Letter Motion to File Stipulation and [Proposed] Order Governing the
Deposition of the Anonymous Trader Under Seal**

Dear Judge Failla,

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, we write to request permission to file the parties' Stipulation and [Proposed] Order Governing the Deposition of the Anonymous Trader (the "Stipulation"), Exhibit A attached to the parties' joint letter to the Court, under seal and in redacted form.

The Stipulation contains the Anonymous Trader's personally identifying information and is therefore to be treated as "strictly AEO in the first instance." ECF No. 195 at 2, 215. To prevent disclosure of any information usable to identify the Anonymous Trader, Plaintiffs intend to redact references to the Trader's name. Accordingly, Plaintiffs respectfully request leave to file Exhibit A under seal and in redacted form to comply with the Court's prior orders. *See* ECF Nos. 195, 215.

Hon. Katherine Polk Failla
September 8, 2023

Respectfully submitted,

/s/ Andrew R. Dunlap

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cc: All Counsel of Record (via ECF)

Application GRANTED. The Clerk of Court is directed to maintain docket entry 438 under seal, viewable to the Court and the parties only. The Clerk of Court is further directed to terminate the pending motion at docket number 437.

Dated: September 8, 2023
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE